

# Federal Defenders OF NEW YORK, INC.

Southern District  
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*Southern District of New York*  
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December 23, 2022

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street,  
New York, NY 10007

**Re: United States v. Baudilio Reyes**  
**20 Cr. 507 ({PAC})**

Dear Judge Crotty:

I write on behalf of my client Baudilio Reyes to respectfully request that the Court temporarily modify the conditions of his bond so that he can travel overnight to the Poconos Mountains in Eastern Pennsylvania with his family during the holidays. Mr. Reyes would like to spend two nights in the Poconos with his family between December 24, 2022 and January 6, 2023. Although the pre-trial services agency (PTS) objects to this modification, it is because of an office wide policy where they always object to overnight travel for individuals on location monitoring. The Government defers to PTS.

On July 30<sup>th</sup>, 2020, Magistrate Judge Sarah L. Cave imposed the following bail conditions: \$50,000 PRB; 2 FRP'S; Travel Limited to SDNY/EDNY & ED PA (& Points in Between for Court); Surrender Travel Documents (& No New Applications); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft to Continue or Seek Employment; Deft Not to Possess Firearm/Destructive Device/Other Weapon; Deft to Be Released on Own Signature; Remaining Conditions to Be Met by 9/1/2020. Mr. Reyes was subsequently placed on a curfew enforced by electronic monitoring on July 30, 2021.

Mr. Reyes has been fully compliant with the conditions of his bail, and constantly communicates with his PTS officer in the Eastern District of Pennsylvania, Charles Meissler. If approved for overnight travel, Mr. Reyes will seek approval for his specific travel itinerary with Mr. Meissler in advance and keep in constant contact with him throughout the duration of his trip.

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12/29/2022

A temporary bail modification to allow Mr. Reyes two overnight stays in the Poconos is granted under the condition that a full itinerary is provided to Pretrial. SO ORDERED.

Respectfully submitted,

/s/Zawadi Baharanyi

Zawadi Baharanyi  
Assistant Federal Defender  
Tel.: 917-612-2753

**SO ORDERED:**



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**HONORABLE PAUL A. CROTTY**  
**United States District Judge**

**cc: AUSA Kaylan Lasky**  
**AUSA Brandon Harper**  
**PTS Officer Josh Rothman**